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Attorneys for Plaintiff

**UNITED STATES DISTRICT COURT  
FOR THE CENTRAL DISTRICT OF CALIFORNIA**

FLOWZ DIGITAL LLC, a Delaware  
Limited Liability Company; and

Plaintiff,

vs.

CAROLINE DALAL, an individual; and  
FLOWZ STAFFING LLC, a California  
Limited Liability Company; and DOES 1  
through 20 inclusive;

Defendants.

Case No.: 2:25-cv-709

**JOINT STIPULATION OF  
VOLUNTARY DISMISSAL WITH  
PREJUDICE**

**STIPULATION OF VOLUNTARY DISMISSAL WITH PREJUDICE**

Plaintiff Flowz Digital LLC and Defendants Caroline Dalal and Flowz Staffing LLC, by and through their respective counsel of record, hereby stipulate and agree as follows:

The Parties have resolved this matter pursuant to a settlement agreement that fully disposes of all claims and defenses. In accordance with that agreement and Federal Rule of Civil Procedure 41(a)(1)(A)(ii), the Parties stipulate that the above-captioned action, including all claims asserted therein, shall be dismissed with prejudice. Each Party shall bear its own attorneys' fees, costs, and expenses.

RESPECTFULLY SUBMITTED this 15<sup>th</sup> day of September, 2025.

**OMNI LEGAL GROUP**

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Attorneys for Plaintiff,

Flowz Digital LLC

**KIBRE NEMAN LLP**

/s/ Mirit Neman

Mirit Neman

Attorney for Defendants

Caroline Dalal and Flowz Staffing,  
LLC